

EXHIBIT A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

VIEWSONIC CORPORATION

Plaintiff,

vs.

CHUNGHWA PICTURE TUBES, LTD., et al.,

Defendants.

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 14-cv-02510

REPORT OF ALAN S. FRANKEL, Ph.D.

June 6, 2014

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1. Introduction

1.1. Assignment

1. ViewSonic Corporation (“ViewSonic”) was incorporated in California in 1987 as Keypoint Technology Corporation.¹ It is headquartered in Walnut, California.² Keypoint introduced the ViewSonic brand of color computer monitors in 1990, and the company soon adopted that name.³

2. During the period at issue in this case, ViewSonic purchased “CRT Products” – in ViewSonic’s case, computer monitors that contained cathode ray tubes (“CRTs”), which ViewSonic distributed to various types of resellers throughout the United States.⁴ ViewSonic was the sixth leading brand of CRT monitors sold in the United States in 1997.⁵

3. ViewSonic alleges that the Defendants and alleged co-conspirators colluded in setting prices of CRTs and that this caused ViewSonic to pay higher prices for CRT Products than it would have paid absent the conspiracy.⁶

4. I have been asked by counsel for ViewSonic to: (1) calculate damages under the assumption that the Defendants are found to be liable in this litigation; (2) assume that the alleged conspiracy resulted in anticompetitive overcharges for CRTs – the tubes incorporated into the CRT Products purchased by ViewSonic – as determined by Dr. James McClave, another

¹ Funding Universe, “ViewSonic Corporation History,” <http://www.fundinguniverse.com/company-histories/viewsonic-corporation-history/>.

² ViewSonic SEC Form 10-K for the year ended December 31, 2005, p. 6.

³ Funding Universe, “ViewSonic Corporation History,” <http://www.fundinguniverse.com/company-histories/viewsonic-corporation-history/>.

⁴ ViewSonic SEC Form 10-K for the year ended December 31, 2005, p. 8.


⁵ United States Environmental Protection Agency, “Computer Display Industry and Technology Profile,” December 1998, EPA 744-R-98-005, p.8.

⁶ Complaint, in *ViewSonic Corporation v. Chunghwa Picture Tubes, Ltd., et al.*, ¶¶2, 84, 245-46. The conclusions and computations that I present in this report would either be unaffected by changes to the current Defendants and co-conspirators or could be modified through simple adjustments as described in this report to account for such changes.

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conspiracy, and before and after adjusting for inflation, are shown in Exhibit 17 and summarized in Exhibit 20a, with additional detail shown in Exhibit 20b.

June 6, 2014



Alan S. Frankel, Ph.D.

Exhibit 15 - Vendors Designated as "Direct" Purchases

Plaintiff	Conspirator	Direct Vendor Names Appearing in Data
Viewsonic	Daewoo	WEIHAI DAEWOO ELECTRONICS CO, LTD
	Jean Co	Jean Co Ltd JCL
	LGE	LG ELECTRONICS INC. LGEI
	Panasonic	MJ MT
	Tatung	TAT TATUNG

Exhibit 20b - Damages Detail

			Before Inflation Adjustment		After Inflation Adjustment	
			Before Market Share Adjustment	After Market Share Adjustment	Before Market Share Adjustment	After Market Share Adjustment
	Product	Vendors				
ViewSonic	Monitors	Total Direct	\$167,744,897	\$152,673,471	\$269,282,981	\$244,985,804
		Daewoo	\$0	\$0	\$0	\$0
		Jean Co	\$48,653,155	\$44,115,106	\$77,541,773	\$70,294,727
		LGE	\$14,630,944	\$13,280,100	\$23,251,111	\$21,102,723
		Panasonic	\$71,134,648	\$63,771,251	\$115,849,102	\$103,854,359
		Tatung	\$15,614,325	\$15,017,305	\$23,970,302	\$23,041,580
		Unallocated Direct	\$17,711,825	\$16,489,709	\$28,670,694	\$26,692,416